# METHOD FOR COMPLYING WITH EMPLOYMENT ELIGIBILITY VERIFICATION REQUIREMENTS

Inventor(s):

Elaine V. Morley John T. Andersen

#### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

# METHOD FOR COMPLYING WITH EMPLOYMENT ELIGIBILITY VERIFICATION REQUIREMENTS

#### TECHNICAL FIELD OF THE INVENTION

[0001] This invention relates to methods for data entry and verifying that data is correctly entered, and, in particular, to a method for assuring employer compliance in with employee employment eligibility verification requirements.

#### CROSS REFERENCE TO RELATED APPLICATION

[0002] The present application claims priority to U.S. Provisional Patent Application Serial No. 60/222,117, filed July 28, 2000, and entitled "Method for Reviewing Compliance With Employer Eligibility Verification Requirements," the disclosure of which is hereby incorporated by reference as if fully set forth herein.

20

25

5

10

#### BACKGROUND OF THE INVENTION

[0003] The U.S. Department of Justice, Immigration and Naturalization Service, administers federal statutory requirements and regulations which require that employers verify that any persons hired as employees or to perform services, that is workers, are eligible to work in the United States. Presently, to assure that employers adequately verify eligibility to work in the United States, federal regulations require that employers complete a U.S. Department of Justice, Immigration and Naturalization Service, Form I-9 document. Completion of the Form I-9 requires that employers inspect various ones of specified documents, which requires that employers review originals of the documents and not reproductions of the documents, to determine the employee's eligibility to work in the United States. If an employer does not perform the procedure outlined in the Form I-9, and accurately complete the Form I-9, such employer is subject to civil penalties and persons completing such forms on behalf of the employer may also be subject to criminal penalties for not complying with the eligibility verification requirements under United States immigration law.

[0004] Accurately verifying employment eligibility and successfully completing the U.S. Department of Justice, Immigration and Naturalization Service's Form I-9 to verify employment eligibility requires that each employer train at least one person who develops the requisite expertise and familiarity with verification requirements to accurately complete such forms. Employers will also have to monitor previously completed Form I-9's to determine that new Form I-9's are completed prior to expiration the documents used to verify the employees' eligibility to work in the United States. Industry wide, across the United States, this creates a large financial burden for various companies to adequately assure that their personnel are appropriately trained to meet and maintain such compliance requirements, and often, once trained, such trained persons are subject to turnover. Additionally, as employment eligibility requirements change, such persons will have to keep current on any regulatory changes and implement any changes in regulatory requirements into the employment eligibility program of each particular employer in the United States.

3

# 15 22 20

5

10

#### SUMMARY OF THE INVENTION

A method is provided for assuring employer compliance with verifying employment eligibility in the United States, which aids employers in assuring compliance with federal regulations. An employer may utilize the method of the present invention by accessing a software program over a global computer network, through telecommunications systems, or by obtaining and loading the appropriate software in a local computer on his job site. Compliance alerts and compliance tips are displayed for guiding an employer in completing the Form I-9. The compliance tips may be selected and modified by a particular employer. After a Form I-9 is completed, the data in such forms may be automatically audited to analyze whether the completed Form I-9 has been accurately completed, and a listing provided of various errors and additional data required. During the audit, various compliance rules are applied to Form I-9 data entered into a data processing system to determine whether various Immigration and Naturalization Service regulations are met in completing an employment eligibility verification Form I-9. The method is administered by a singular service provider for multiple employers, to assure that applicable regulations are incorporated and updated regularly to assure industry-wide compliance. The process further provides a central system for managing the current Form I-9's for employers, including identifying documents which are soon to expire such that the employers can be notified to complete a new employment eligibility Form I-9 prior to the expiration of such documents, which assures continued compliance with federal regulations.

4

#### BRIEF DESCRIPTION OF THE DRAWINGS

[0005] For a more complete understanding of the present invention and the advantages thereof, reference is now made to the following description taken in conjunction with the accompanying Drawings in which:

5

10

- Fig. 1 is a view screen display of an I-9 Administration Section, showing various tasks for use in a process according to the present invention;
- Fig. 2 is a view screen display of a Reporting Section, showing various report options which are available according to the process;
- Fig. 3 is a view screen display of an Utilities Section, showing various administrative tasks for managing administration of and access to the process;
- Fig. 4 is a view screen display of Action Options which may be performed in working with a particular Form I-9 document, or a group of documents;
  - Figs. 5A and 5B together provide a flow chart showing operation of the process;
- Fig. 6 is a block diagram showing a process for searching for an existing Form I-9 document among various documents affiliated with a particular employer;
- Fig. 7 is a flow chart showing a process for performing a compliance analysis, to determine whether an employment eligibility verification form has been accurately completed; and
- Fig. 8 is a flow chart showing various process steps for displaying alerts when document types are selected as verification documents for use in a particular I-9 document.

# 15 75 7 2 3 2 2 2 2 2 3

25

5

10

#### DETAILED DESCRIPTION OF THE INVENTION

[0006] Fig. 1 is a view screen display of an I-9 Administration Section listing 12 for use in verifying employment eligibility of a potential employee according to the present invention. The I-9 Administration Section 12 lists several options for initiating various tasks. The first listed task is entitled "Audit A New I-9 Document." The Audit task allows a user to import data from an existing Form I-9 document, and then to perform a compliance rules analysis on the data of the existing Form I-9 document to determine whether the existing Form I-9 document was correctly completed. Such data for auditing may be imported from another type of database, manually entered into the system, or optically scanned from previously completed Form I-9 documents. The next listed task in the I-9 Administration Section 12 is entitled "Add A New I-9 Document." The Add task allows a user to initiate the pulling up of a blank Form I-9, in which data can be filled into the various fields. The I-9 Administration Section 12 further includes a task listing entitled "Existing I-9 Documents Search And Edit" task, by which all of the existing Form I-9 documents associated with a particular employer are listed for selection by a user for editing. The user may then look through the listing to select a particular Form I-9 document and section various Action Options, such as performing the compliance rules analysis in a recalculate analysis, printing, auditing, editing or deleting. The last listed task in the I-9 Administration Section 12 is the Individual I-9 Document Search and Edit. The Individual I-9 Document task allows a user to search for an existing Form I-9 document for a particular employee, by searching for such employee fields as first name, last name, date of birth, social security number, and other such employee identifying numbers.

[0007] Fig. 2 is a view screen display of a Reporting Section 14, from which various reports may be selected for review by a user. The first listed report is an *Additional Information*Needed Report, which lists various data needed to complete the Form I-9's associated with a particular employer as identified by performing the compliance rules analysis on the Form I-9 documents associated with a particular employer. Preferably, the *Additional Information*Needed Report will not list incurable defects in the Form I-9's being analyzed, but will only this those defects in the documents which may be cured. Such curable defects will include

various incompatible and missing data entries listed in Form I-9 documents associated with the particular employer. The Additional Information Needed Report may also identify both blank fields and inconsistent entries, such as the selection of incompatible document types or the entry of incompatible dates, which cannot be correct.

5

10

20

25

The next listing in the Reports Screen of Fig. 2 is Data Entry Audit Report, which provides a report of when various Form I-9's are completed for review by an employer. Typically, the employer will list a range of dates from which the report is created. The Data Entry Audit Report will then provide a listing of the Form I-9's which were completed during the selected range of dates, preferably providing the listing in tabular form and including the for each listed Form I-9 the employee's name, social security number, date of hire, work location, and the like. From this listing, employer's may determine if a sufficient number of Form I-9's have been completed to accommodate the amount of persons hired by the employer over selected range of dates.

The next listing in the Reporting Section 14 is a Statement of I-9 Completion Report. This report lists for the various Form I-9 documents associated with a particular employer both the documents which are completed, and the documents which are completed except for incurable defects. The Statement of I-9 Completion Report will not list those documents which have curable defects, which should be listed in the Additional Information Needed Report. Similarly, the Additional Information Needed Report will not list those documents which are listed in the Statement of I-9 Completion Report as being either fully complete Form I-9's, or fully complete Form I-9's except for incurable defects.

Presently, there are four incurable defects which, if corrected on a Form I-9, would constitute fraud and subject the responsible employer and any person making such changes on that employer's behalf to criminal liability. One of the four incurable defects is failure of an employer to require a newly hired employee to complete all or any portion of Section 1 of a Form I-9 no later than on the date on which that employee's employment services for that employer commence. A second one of the four incurable defects is failure of an employer to

25

5

10

reverify Form I-9 Section 1 or Section 2 expiration date, if such date requires reverification, no later than the date on which the document to which such date relates expires. A third incurable defect is failure of an employer to complete Section 2 of the Form I-9 within three (3) days of the employee's employment start date, which could be significantly later than the date on which the employment was offered and accepted and which was the first opportunity under law to complete the form I-9 without possible consequences for discriminatory treatment. A fourth incurable defect is failure of an employer, when rehiring a former employee, to update Section 3 of the Form I-9 that remains on file for that employee, subject to the retention requirement. Each of the above-noted four defects are incurable because they are date sensitive and it would be fraudulent for a person to place a different date on a Form I-9 than that on which the pertinent Form I-9 section has actually been completed.

The next report listed in the Reporting Section 14 is a *Combined Audit Report*, which is preferably a combination of the *Additional Information Needed Report* and the *Statement of I-9 Completion Report*. The *Combined Audit Report* lists all of the Form I-9's associated with a particular employer, which includes the Form I-9's which are fully complete, the Form I-9's which have curable defects and the Form I-9's which have incurable defects. The *Combined Audit Report* will also identify the employee of the listed Form I-9, and the particular defects associated with various ones of the listed Form I-9's.

The next report in Reporting Section 14 is an *Expiring Employment Documents Report*. This report identifies various documents which are expiring on particular dates which are associated with a particular employer. This report may be run according to a selected range of dates, such that an employer may begin processing the required updates for the pertinent Form I-9's prior to the actual dates of expiration of the documents. Should a document used in Section 2 of the Form I-9 expire prior to updating of the pertinent Form I-9, this would create an incurable defect for that particular Form I-9, subjecting the employer to potential liability.

8

5

10

The next report is an *Invoice Report*, which lists the various invoice balances a particular employer has on account with a particular compliance analysis service provider providing the services of to the present invention to that employer. The next report listed in the Reporting Section 14 is a *Recalculate Statement of I-9 Completion Report*, which will perform the compliance rules analysis by running checks for each Form I-9 associated with a particular employer to provide an error listing in a *Statement of I-9 Completion Report* for the various documents.

[0008] Fig. 3 is a view screen listing of a Utilities Section 16, listing various options for performing administrative tasks. The first menu listing is entitled "Add A New Company."

The next listing is entitled "Company Data Search & Edit," in which data associated with a particular employer may be searched and edited. The next listing in the Utilities Section 16 is entitled "Administer Logon ID's." This task is used for changing various logon ID's and passwords for particular employees of an employer who are performing the administrative tasks for the present method. The next listed task is entitled "Login Notices Administration," which allows the service provider to post various notices regarding processing of the Form I-9's, such as changes in immigration regulations which are not yet incorporated into the rules used for compliance analysis. The Login Notices may also post for viewing special notices issued by the Immigration and Naturalization Services affecting a particular group of foreign nationals, and the like. Preferably, such Login Notices will be provided by a pop-up window which appears when a user logs into the system. The next listing is entitled "I-9 TIPS Administration," which allows a particular employer to modify the TIPS for display to their associated users who are entering data into a Form I-9.

[0009] Fig. 4 is a view screen listing of Action Options 18, which are various actions which may be taken when reviewing a particular Form I-9 document. The first is listed action is entitled "Edit," and allows a user to go back into the selected document to edit the document. Preferably, the document is displayed and the user is allowed access to the various individual fields by selecting a particular field viewed on the screen with a graphical user interface. The next action listed in the Action Options Menu 18 is entitled, "Audit." The Audit feature

9

25

5

10

displays the compliance rules analysis report for a particular selected Form I-9 document, without displaying any alerts or TIPS. The Audit feature may be used to generate a Statement of I-9 Completion Report for particular documents, or for a group of documents of an associated employer. The next action option is entitled "View Print Screen," and primarily displays the Form I-9 documents in a fixed graphical format, as it will be printed if printing is selected when the View Print Screen option is displayed. The next listed option in the Action Options Menu 18 is entitled "Service Charges," and provides a display of the various service charges due by the employer affiliated with the user I.D. currently accessing the system. The next option is entitled "Delete," and may be used to delete the field data of a particular Form I-9 document. The next option in the Action Options Menu 18 is entitled "Display Additional Information Needed Report," which provides a display listing of additional data required to complete the selected documents associated with the particular employer. The next option in the Action Options Menu 18 is entitled "Recalculate Analysis," and recalculates the audit report of the compliance analysis for a group of particular selected documents. This option, as opposed to the audit option, would recalculate the analysis from a group of selected documents by running checks in I-9's. The audit feature will only recalculate the checks analysis for a particular document.

[0010] Fig. 5A and Fig. 5B together provide a flow chart showing a method for verifying employment eligibility of employees according to the present invention. The flowchart begins at block 20, after the employee has completed and signed Section 1 of a Form I-9 and the employer is beginning to complete Section 2 of the Form I-9. The first step in the process is the step of selecting documents from a list of acceptable documents, shown in block 20. After selection of acceptable documents, the employer must personally review originals of the acceptable documents, and not copies, in the step shown in block 22. In block 24, a display Task Menu Screen step is depicted, in which preferably a combined menu listing of the I-9 Administration Section 12 of Fig. 1, the Reporting Section 14 of Fig. 2, and the Utilities Section 16 of Fig. 3 are displayed on a single view screen. The next step is to select a task, with the selected task being shown in Fig. 5A as *Add A New I-9 Document*, which is depicted in block 26. In block 28, the Form I-9 document is displayed on a view screen. If *Add A New* 

5

10

I-9 Document is selected in I-9 Administration Section 12, the display I-9 document step of block 28 will display an Form I-9 document with all the fields blank, that is, a blank document will be displayed. If Edit An Existing Document is selected, the display I-9 document screen in block 28 will display an existing document, with data for the various fields displayed in the Form I-9 document. Next, a user will select a data entry field and the computer will determine whether the field has been selected in decision block 30. When a field is selected in block 32, the display TIPS step is performed. If there are any TIPS for display with the associated field, such TIPS will be displayed on the view screen in a pop-up window. In block 34, the data will be entered by the user and stored in a database for the Form I-9, and then the new entered data is displayed in the Form I-9 document screen 28. The process returns to the select field decision block 30, and if a new field is selected, the display TIPS step 32 and enter data step 34 are performed. The process will return to the display Form I-9 document screen shown in block 28 and wait until a new field is selected for data entry. New fields may be selected by hitting the Enter key without changing the data listings in a particular field.

[0011] Next, the process will proceed to the step depicted in block 36 if a new field is not selected. Block 36 is a run checks decision block which determines whether run checks has been selected by requesting an audit or perform compliance analysis task. From the run checks decision block 36, the process proceeds to block 38 to apply various Form I-9 document rules will be applied to the various data fields to perform the compliance rules analysis. The rules for compliance analysis are set forth in Table III. If any errors are detected in the decision block 40 after the compliance analysis is complete for the particular Form I-9, an error list of various errors compiled will be displayed in block 42. If not, the process will return back to the display Form I-9 screen of block 28. If errors are displayed in block 42, they will preferably be displayed in a pop-up window which is overlaid with the display Form I-9 document screen of block 28.

[0012] If the option of save and print a particular Form I-9 is selected, as determined in decision block 44, the process proceeds to perform for the compliance analysis step depicted in block 46. The compliance analysis step of block 46 is the same as the compliance analysis

5

10

step depicted in block 38, and is performed as a final check prior to printing. If errors are detected as shown in block 48, then the a display error list report 50 will be performed and the listing of errors will be displayed in a window which pops up to overlay the display I-9 document screen of block 28. At this point, an option is provided to cancel printing and stay in the display I-9 screen so that the user may correct the errors, and an option is also provided to disregard the errors and proceed to the display print window step of block 52 to print the Form I-9. If no errors are detected in decision block 48, the process will proceed to display print window step depicted in block 52. Reminder messages preferably appear, such as a reminder that the user should review an employee's original documents in completing the Form I-9. Then, a user may select to print the Form I-9 document in block 54, and the process will proceed to the step of block 56 in which the Form I-9 document will be printed and saved. The print process ends as depicted in block 58, and the process returns to the display I-9 Administration Section of block 24. If print is not selected in decision block 54, then a user may select to go back to the previous screens, as depicted in block 60. As depicted in block 62, a user may selected go back to previous display screens to return to pull down an I-9 search and edit a document, by proceeding back to the step of the Display I-9 Administration Section depicted in block 24.

[0013] If an Form I-9 document is being displayed on a view screen in the step depicted in the block 28, and cancel is selected, then the process will determine that cancel has been selected as shown by the step depicted in the decision block 72. The field data will be cleared from the various fields of the Form I-9 document as shown in the step depicted in block 74, and the process will return to the task menu as depicted in the block 24. If the save and return to the task menu is selected while the process is displaying a Form I-9 document on the view screen in the step depicted in block 28, this will be detected in the step depicted in the decision block 76. The field data is saved in the step depicted in block 78, and the process will proceed to the display task menu step of block 24. If, when the Form I-9 document is displayed on the screen in the step depicted in block 28, the save and add a new Form I-9 document is selected, field data for the particular document being displayed at the time of selection will be saved in the step depicted in block 82. The fields will be reset and cleared in step depicted in block 84,

25

5

10

and the process will proceed to the step depicted in block 28, in which a blank Form I-9 document will be displayed on the view screen.

documents affiliated with a particular employer. From the display task menu step of block 24, if the *Existing I-9 Documents Search and Edit* task is selected from the I-9 Administration Section of Fig. 1, the process will proceed to the select task step depicted the block 92. In the step depicted in block 94, the various Form I-9 documents will be displayed in the search and edit screen. This is a tabular listing of each of the various ones listing identifying indicia, such as the employee name and other such information. In the step depicted in block 96, all the Form I-9 documents associated with the user I.D. and action options will be listed. The various action options available are preferably those listed in the Action Options menu 18 of Fig. 4. In the step depicted in block 98, a particular action option is selected and performed by going to the respective steps selected in the process of the block diagram shown in Figs. 5A and 5B. Then, the process will end in the step 100 and return to the step of displaying the I-9 Administration Section 22 of Fig. 1.

[0015] Fig. 7 depicts a process flow for performing the compliance analysis, that is the run checks step for the blocks 38 and the block 46 of Fig. 5A. Once the run checks feature is selected to determine the compliance analysis report, the process proceeds to the block 102, which depicts the step of loading field values into memory. Then, expected values are loaded into memory in the step depicted in the block 104. In the block 106, the expected values loaded into block 104 and the field values loaded into block 102, for a particular field, are compared to determine whether an error has occurred. If an error has occurred, the expected field values will not match or equal the loaded field values, and a generate error step will be performed as depicted in the block 108, The error listing will be added to an error list in the block 110. Then, the process will return to the step in decision block 112 to determine whether to repeat the process depicted in the blocks 102, 104, 106. If another field is not to be checked, then it will proceed to end step depicted in block 114, and the process will then return back to the display screen shown in step 24 of Fig. 5A.

20

25

5

10

[0016] Fig. 8 is a block diagram depicting the various process steps for displaying alerts when particular document types are selected in the verification documents fields of a particular Form I-9 document. When a select document type filed is selected as depicted in block 122, a process will proceed to decision block 124 to determine if there is an alert for the particular document type selected in the pull down menu. If there is no alert, the process will proceed to the end step shown in block 130, returning back to the display I-9 document screen, depicted in the block 28 in Fig. 5A. If there is an alert, the process will proceed to the step of displaying the alert, as depicted in the block 126. The alert is preferably displayed as a pop-up window which overlays the I-9 document screen. Once the alert has been viewed, the user may close the alert window, as depicted in block 128. Then, the display alert process will end, as depicted in the block 130, and the process will proceed back to the display I-9 screen, as depicted in block 28 of Fig. 5A.

[0017] The method of determining employer compliance with verification of employment eligibility of the present invention is performed, at least in part, in a data processing system. The processing may be performed across a distributed network, such in a global computer network, or across telecommunication systems, with processing of various steps according to the method occurring for a particular document at remote locations. For example, an employer could access a remote server through a global computer network or through a telecommunications system, log into the server and remotely process the employment verification of an employee at the remote server. Similarly, the employer may use a local data processing system to locally process the information to verify the identity and employment eligibility of the employee. Employer and employee signatures may also be applied to an electronic document via an electronic or digital signatures, according to the present invention. Various steps according to the method may also be processed in part manually by the employer verifying employment, and then the resulting data may be optically scanned into or manually entered from a paper for I-9 for electronic storage, such that a data processing system can perform the checks step of Fig. 7 to determine employer compliance with various Immigration and Naturalization Service regulations.

10

[0018] The process also preferably uses the Social Security Administration's Enumeration Verification Service ("EVS") to verify the validity of a social security number presented by an employee for employment, and such other employee data which may be provided by the employee. Other such employee date provided by and employee and entered into a data processing system according to the present invention may be compared to data listed for the employee on a remote server to audit the accuracy of the employee suppled data, such as with government databases, in addition to the Social Security Administration's EVS, credit bureaus, licensing and association databases, general databases, and the like. Historical databases may also be used to audit old work address, business address, and such other employee provided information.

[0019] Tables are listed in the following to provide various examples of forms, rules and the like used with the present invention. Table I lists one page of a Form I-9. Table II lists acceptable documents for use for identification purposes with the Form I-9. Table III lists the verification rules. Table IV lists Alerts. Table IV lists the TIPs.

[0020] Although the preferred embodiment has been described in detail, it should be understood that various changes, substitutions and alterations can be made therein without departing from the spirit and scope of the invention as defined by the appended claims.

Atty. Dkt. No.: MORL-25,783

**Employment Eligibility Verification** 

Please read instructions carefully before completing this form. The instructions must be available during completion of this form. ANTI-DISCRIMINATION NOTICE: It is illegal to discriminate against work eligible individuals. Employers CANNOT specify which document(s) they will accept from an employee. The refusal to hire an individual because of a future expiration date may also constitute illegal discrimination.

Section 1. Employee Information a	and Varification To	he completed and signed by	, employee	at the time employment begins
Print Name: Last	First	Middle I		Maiden Name
Time Name. Last	LILZE	i aldonivi	ı ıstıdı	Maidell Name
Address (Street Name and Number)		Apt. #		Date of Birth (month/day/year)
City	State	Zip Cod	e	Social Security #
I am aware that federal law provid	les for	I attest, under penalty o	f perjury, t	that I am (check one of the following):
imprisonment and/or fines for false		A citizen or na	tional of th	e United States
use of false documents in connect				sident (Alien # A
completion of this form.	ion with the	•		ork until//
Employee's Signature		(Alien # or Ad	mission #)	Date (month/day/year)
Employee 3 Signature				Date (montroday/year)
Preparer and/or Translator other than the employee.) I attest best of my knowledge the inform.	, under penalty of perjui			
Preparer's/Translator's Signature		Print Name		
Address (Street Name and Number	r, Cîty, State, Zip Code,			Date (month/day/year)
				, , ,
Section 2. Employer Review and Ve examine one document from List B and one fro document(s)	erification. To be com om List C, as listed on th	npleted and signed by employ ne reverse of this form, and re	er. Examir ecord the t	ne one document from List A OR Litle, number and expiration date, if any, of the
List A	OR	List B	AND	List C
Document title:	<b>2</b>	1		
Issuing authority:				
Document #:	<u> </u>			
Expiration Date (if any)://	/	./		//
Document #:				
Expiration Date (if any)://				
CERTIFICATION - I attest, under penalty employee, that the above-listed docum employee began employment on <i>(mont</i> is eligible to work in the United States. employment.)	ent(s) appear to be g th/day/year)// (State employment a	enuine and to relate to the best	he emplo t of my k	yee named, that the nowledge the employee
Signature of Employer or Authorized Represe	ntative Print Name	e		Title
Business or Organization Name A	ddress <i>(Street Name an</i>	d Number, City, State, Zip C	Code)	Date (month/day/year)
Section 3. Updating and Reverifica	tion. To be completed	and signed by employer.		
A. New Name (if applicable)  B. Date				of rehire (month/day/year) (if applicable)
<ul> <li>If employee's previous grant of work authority.</li> </ul>	orization has expired, pro	ovide the information below	for the do	cument that establishes current employment
Document Title:	Document #: _	Expiration Di	ate (if any)	)://
I attest, under penalty of perjury, that to the b document(s), the document(s) I have examined	est of my knowledge, the	nis employee is eligible to wor	rk in the U	nited States, and if the employee presented
Signature of Employer or Authorized Represe				Date (month/day/year)

#### LISTS OF ACCEPTABLE DOCUMENTS

#### LIST A

#### Documents that Establish Both Identity and Employment Eligibility

- U.S. Passport (unexpired or expired)
- 2. Certificate of U.S. Citizenship (INS Form N-560 or N-561)
- 3. Certificate of Naturalization (INS Form N-550 or N-570)
- Unexpired foreign passport, with I-551 stamp or attached INS Form I-94 indicating unexpired employment authorization
- Alien Registration Receipt Card with photograph (INS Form I-151 or I-551)
- 6. Unexpired Temporary Card (INS Form I-688)
- Unexpired Employment Authorization Card (INS Form I-688A)
- 8. Unexpired Reentry Permit (INS Form I-327)
- 9. Unexpired Refugee Travel Document (INS Form I-571)
- Unexpired Employment Authorization Document issued by the INS which contains a photograph (INS Form I-688B)

#### LIST B

#### Documents that Establish Identity

**OR** 

- Driver's license or ID card issued by a state or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, sex, height, eye color and address
- ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, sex, height, eye color and address
- School ID card with a photograph
- 4. Voter's registration card
- 5. U.S. Military card or draft record
- 6. Military dependent's ID card
- U.S. Coast-Guard Merchant Mariner Card
- 8. Native American tribal document
- Driver's license issued by a Canadian government authority

For persons under age 18 who are unable to present a document listed above:

- 10. School record or report card
- 11. Clinic, doctor or hospital record
- 12. Day-care or nursery school record

#### LIST C

#### Documents that Establish Employment Eligibility

AND

- U.S. social security card issued by the Social Security Administration (other than a card stating it is not valid for employment)
- Certification of Birth Abroad issued by the Department of State (Form FS-545 or Form DS-1350)
- Original or certified copy of a birth certificate issued by a state, county, municipal authority or outlying possession of the United States bearing an official seal
- 4. Native American tribal document
- 5. U.S. Citizen ID Card (INS Form I-197)
- 6. ID Card for use of Resident Citizen in the United States (INS Form I-179)
- Unexpired employment authorization document issued by the INS (other then those listed under List A)

Illustrations of many of these documents appear in Part 8 of the Handbook for Employers (M-274)

Atty. Dkt. No.: MORL-25,783

### TABLE III: RULES FOR COMPLIANCE ANALYSIS

I-9 Verifica	ition	?
		Message (DE = Data Entry, AI =
		Additional Information, SC =
Field	Condition	Statement of Completion)
		DE - Section 1, Last Name Last name
		field is blank
1 Last Name	is blank	AI - Employee Last Name is missing
		DE - Section 1, First Name First nam
		field is blank
2 First Name	is blank	AI - Employee First Name is missing
3 Middle Initial	no verification	
4 Maiden Name	no verification	
		DE - Section 1, Address Address field
		is blank
5 Address	is blank	AI - Address Line is missing
6 Apt. #	no verification	
		DE - Section 1, City City field is blank
7 City	is blank	AI - City is missing
		DE - Section 1, State State field is
		blank
8 State	is blank	AI - State is missing
		DE - Section 1, Zip Code Zip code
		field is blank
9 Zip	is blank	AI - Zip Code is missing
		DE - Section 1, Date of Birth Date of
		Birth is Invalid
10 Date of Birth	is blank or invalid	AI - Date of Birth is missing
		DE - Section 1, Status Category
		Employer must ensure that employee
		completes Section 1. Do not continue
		to Section 2 until employee completes
		Section1. Otherwise, the INS may infe
		that a violation has occurred.
11 Attestation	is blank	AI - Status Category is missing

	W		Message (DE = Data Entry, AI =
٠			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 1, Status Category Only
			one Status category is allowed
12	Attestation	two or more are chosen	Al - Only one Status category is allowed
			DE - Section 1, Authorized To Work
		is blank or invalid AND	Until Authorized to work status must
		"Authorized Alien"	include a valid work expiration date
13	Work Expiration Date	checked	AI - Work Expiration Date is missing
			Trackingwill show up on Expiring
			Employment Documents Report 120
14	Work Expiration Date	is not blank	days prior to expiration
			DE - Section 1, Alien/Admission
		length is not 8 or 9 or 10	Number Alien Number must be 8 or 9
		or 11 AND "Authorized	digits
15	Alien/Admission #	Alien" checked	Al - Alien Number must be 8 or 9 digits
			DE - Section 1, Alien Number
			Permanent Alien Number must be 8 or 9
		length is not 8 or 9 AND	digits
		"Permanent Resident"	Al - Permanent Alien Number must be 8
16	Alien #A	checked	or 9 digits
			DE - Section 1, Employee Signature
			Employee signature is missing
17	Employee's Signature	is not present	AI - Employee signature is missing
			DE - Section 1, Employee Signature
			Date Employee signature date is
	Employee Signature		missing
18	Date	is blank or invalid	AI - Employee Signature Date missing
			DE - Section 1, Authorized To Work
			Until Work Expiration Date must not
			be expired at the time employee signs
	Employee Signature		Section 1
	Date vs Work Expiration	is greater than Work	AI - Work Expiration Date was expired
19	Date	Expiration Date	at the time employee signed Section 1

19

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
20	Preparer's Signature	no verification	
21	Preparer's Name	no verification	
22	Preparer's Address	no verification	
	Preparer's Signature		
23	Date	no verification	
		:	DE - Section 2, List A Document Title
			List A Document Title needs to be
			completed
24	List A Title	is blank	Al - List A Title is missing
			DE - Section 2, List A Document Title
			List A Document Title is invalid
25	List A Title	is "Other"	AI - List A Title is invalid
			DE - Section 2, List A Document Title
			List A Document Title given conflicts
			with citizenship status chosen in Section
			1.
			Al - Status of employee indicated in
			section 1 conflicts with documents
	List A Title VS. Section 1	is NOT choice 1,2, or 3	presented in section 2. In Section 1 the
26	Attestation	and is "Citizen"	employee has indi
			DE - Section 2, List A Document Title
			List A Document Title given conflicts
			with permanent resident status chosen
			in Section 1.
			Al - Status of employee indicated in
			section 1 conflicts with documents
	List A Title VS. Section 1	is NOT choice 5 and is	presented in section 2. In Section 1 the
27	Attestation	"Permanent Resident"	employee h

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 2, List A Document Title
			List A Document Title given conflicts
			with alien authorization status chosen in
			Section 1.
			AI - Status of employee indicated in
			section 1 conflicts with documents
	List A Title VS. Section 1	is choice 1,2, 3, or 5 and	presented in section 2. In Section 1 the
28	Attestation	is "Authorized Alien"	employee
			DE - Section 2, List A Issuing Authority
i			List A Issuing Authority needs to be
			completed
29	List A Authority	is blank	Al - List A Issuing Authority is missing
			DE - Section 2, List A First Document
			Number List A first Document Number
			needs to be completed
			Al - List A First Document Number is
30	List A first Document#	is blank	missing
			DE - Section 2, List A First Document
			Expiration Date List A first Document
			Expiration Date needs to be
	List A first Expiration	is blank AND NOT	completed AI - List A First Document
31	Date VS. List A Title	choices 1,2, 3, or 5	(title) Expiration Date is missing
			DE - Section 2, List A First Document
			Expiration Date List A first Document
	List A first Expiration		Expiration Date needs to be
	Date VS. List A Title VS.	is blank AND is choice 5	completed AI - List A First Document
32	Override Expiration	AND NOT overridden	(title) Expiration Date is missing
			Trackingwill show up on Expiring
			Employment Documents Report 120
			days prior to expiration
	List A first Expiration	is not blank AND NOT	
33	Date	choices 1,2,3, or 5	

21

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
1			DE - Section 2, List A First Document
			Number Alien Registration Number
		is choice 5 AND length is	must be 8 or 9 digits and start with an
		10 or (starts with "A" and	'A'
		length is 9) or (starts	AI - List A First Document Number mus
	List A Title VS. List A first	without "A" and length is	be 8 or 9 digits for an Alien Registration
34	Document #	8)	Card
			DE - Section 2, List A Second
			Document Number List A second
			Document Number is required for a
			Foreign Passport
	List A Title VS. List A		AI - List A second Document Number is
35	second Document#	is choice 4 AND is blank	required for a Foreign Passport
			Trackingwill show up on Expiring
	List A second Expiration	is not blank AND NOT	Employment Documents Report 120
36	Date VS. List A Title	choices 1,2,3, or 5	days prior to expiration
			DE - Section 2, List A Second
			Document Expiration Date List A
			second Document Number Date is
			required for a Foreign Passport
	List A Title VS. List A	is choice 4 AND is blank	Al - List A second Document Number
37	second Expiration Date	or invalid or N/A	Date is required for a Foreign Passport
			DE - Section 2, List A Second
			Document Expiration Date List A
			second Document Number has
			expired AI - List A Second Document
			Number (title) has expired (date).
	List A Title VS. List A	is choice 4 AND is prior	Either update in Section 3 or complete
38	second Expiration Date	to current date	new I-9.

5

# TABLE III: RULES FOR COMPLIANCE ANALYSIS

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 2, List A First Document
			Expiration Date List A first Document
	List A first Expiration	is prior to current date	Number has expired Al - List A First
	Date VS. List A Title VS.	AND is NOT choices 1,2,	Document Number (title) has expired
	First Reverification	3, or 5 AND is NOT	(date). Either update in Section 3 or
39	Document Title	updated	complete a new I-9.
			DE - Section 2, List A, B, and C No
			employment verification information wa
			provided. Either List A or BOTH List B
			and List C must be completed
		List A all blanks OR (List	AI - No employment verification
	List A VS. List B VS. List	B all blanks AND List C	information was provided. Need either
40	С	all blanks)	List A or BOTH List B and List C
			DE - Section 2, List A, B, and C Too
			much employment verification
			information was provided. Either List A
i			or BOTH List B and List C must be
		List A NOT all blanks	completed
		AND (List B NOT all	AI - Too much employment verification
	List A VS. List B VS. List	blanks OR List C NOT all	information was provided.Need either
41	С	blanks)	List A or BOTH List B and
			DE - Section 2, List B Document Title -
			List B Document Title not completed
			properly
42	List B Title	is blank	AI - List B Document Title is missing
			DE - Section 2, List B Document Title -
			List B Document Title is invalid
43	List B Title	is "Other"	Al - List B Document Title is invalid

Atty. Dkt. No.: MORL-25,783

Atty. Dkt. No.: MORL-25,783

### TABLE III: RULES FOR COMPLIANCE ANALYSIS

		** 4 3914 91	Message (DE = Data Entry, Al =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 2, List A Document Title
			List A Document Title given conflicts
			with permanent resident status chosen
			in Section 1.
			Al - Status of employee indicated in
			section 1 conflicts with documents
	List B Title VS. Section 1	is choice 4, 5, 7, or 8 and	presented in section 2. In Section 1 the
44	Attestation	is "Permanent Resident"	employee h
			DE - Section 2, List A Document Title
			List A Document Title given conflicts
			with alien authorization status chosen in
			Section 1.
			Al - Status of employee indicated in
			section 1 conflicts with documents
:	List B Title VS. Section 1	is choice 4, 5, 7, or 8 and	presented in section 2. In Section 1 the
45	Attestation	is "Authorized Alien"	employee
			DE - Section 2, List B Issuing Authority
			List B Issuing Authority not completed
			properly
46	List B Authority	is blank	AI - List B Issuing Authority is missing
			DE - Section 2, List B Document
			Number List B Document Number not
			completed properly
47	List B Document Number	is blank	AI - List B Document Number is missing
			DE - Section 2, List C Document Title
			List C Document Title not completed
			properly
48	List C Title	is blank	AI - List C Document Title is missing
			DE - Section 2, List C Document Title
			List C Document Title is invalid
			AI - List C Document Title is invalid
49	List C Title	is "Other"	

		***************************************	Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 2, List C Document Title
			Employer is responsible for verifying
			that Social Security cards used for
			employment verification are not marked
			"not valid for employment" or
			"authorized for employment only with
		is "US Social Security	INS authorization".
50	List C Title	Card"	AI - (Standard
			DE - Section 2 List C Document Title
			List C Document Title given conflicts
			with citizenship status chosen in Section
			1.
			AI - Status of employee indicated in
			section 1 conflicts with documents
	List C Title VS. Section 1	is choice 7 and is	presented in section 2. In Section 1 the
51	Attestation	"Citizen"	employee has indic
			DE - Section 2, List C Document Title
			List C Document Title given conflicts
			with permanent resident status chosen
			in Section 1.
			AI - Status of employee indicated in
			section 1 conflicts with documents
	List C Title VS. Section 1	is NOT choice 1 or 7 and	presented in section 2. In Section 1 the
52	Attestation	is "Permanent Resident"	employee h
			DE - Section 2, List C Document Title
			List C Document Title given conflicts
			with alien authorization status chosen in
			Section 1.
			AI - Status of employee indicated in
			section 1 conflicts with documents
	List C Title VS. Section 1	is NOT choice 1 or 7 and	presented in section 2. In Section 1 the
53	Attestation	is "Authorized Alien"	employee

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 2, List C Issuing Authority
			List C Issuing Authority not completed
			properly
			AI - List C Document Issuing Authority
54	List C Authority	is blank	is missing
			DE - Section 2, List C Document
			Number List C Document Number not
			completed properly
55	List C Document Number	is blank	AI - List C Document Number is missing
			Trackingwill show up on Expiring
	List C Expiration Date	is not blank AND is	Employment Documents Report 120
56	VS. List C Title	choice 7	days prior to expiration
			DE - Section 2, List C Expiration Date
			List C Expiration Date not completed
	List C Expiration Date	is blank or invalid AND is	properly AI - List C Document (title)
57	VS. List C Title	choice 7	Expiration Date is missing
			DE - Section 2, List C Expiration Date
			List C Document has expired AI - List C
			Document (title) has expired
	List C Expiration Date	is prior to current date	(date). Either update in Section 3 or
58	VS. List C Title	AND is choice 7	complete a new I-9.
			DE - Section 2, Hire Date Employee
			start date is missing
59	Employment Date	is blank	AI - Employee start date is missing
			DE - Section 2, List A Document Title
			List A document type no longer
			acceptable after a completion date of
			09/30/97 AI -
			List A Document (title) no longer
			acceptable after a Completion Date of
	Completion Date VS. List	is after 9/30/97 AND	09/30/97. Either update in Section 3 or
60	A Title	choice 2,3,8, or 9	complete a new I-9

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 2, List A First Document
			Expiration Date List A first document
			expired before document completion
	List A first Expiration	is prior to Completion	date AI - List A First Document (title)
	Date VS. Completion	Date AND NOT choices	expired (date) before Completion
61	Date VS. List A Title	1, 2, 3, or 5	Date.
			DE - Section 2, List A Second
			Document Expiration Date List A
			second document expired before
	List A second Expiration	is prior to Completion	document completion date Al - List A
	Date VS. Completion	Date AND NOT choices	Second Document (title) expired
62	Date VS. List A Title	1, 2, 3, or 5	(date) before Completion Date.
			DE - Section 2, List C Document
			Expiration Date List C document
			expired before document completion
	List C Expiration Date		date AI - List C Document (title)
	VS. Completion Date VS.	is prior to Completion	expired (date) before Completion
63	List C Title	Date AND is choice 7	Date.
			DE - Section 2, Employer Signature
			Date Document completed date is
			missing
			AI - Document Completion Date is
64	Completion Date	is blank	missing
			DE - Section 2, Employer Signature
			Date The date completed is more
			than 3 business days of when employee
			begins work. Verify dates on form.
			SC - This I-9 was not completed within
	Employment Date VS.	is greater than 3 days	3 business days of when employee
65	Completion Date	after Employment Date	begins work

5

Atty. Dkt. No.: MORL-25,783

# TABLE III: RULES FOR COMPLIANCE ANALYSIS

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 1, Authorized To Work
			Until Work Expiration Date must not
			be expired at the time employer signs
	Completion Date VS.		Section 2
	Section 1 Authorized	is greater than Work	AI - Work Expiration Date was expired
66	Until Date	Expiration Date	at the time employer signed Section 2
			DE - Section 2, Employer Signature
			Authorized Representative signature is
			missing.
			AI - Authorized Representative
67	Representative Signature	is not present	signature is missing.
			DE - Section 2, Employer Name
			Authorized Representative Name is not
			complete
			AI - Authorized Representative Name is
68	Representative Name	is blank	missing
			DE - Section 2, Employer Title
			Authorized Representative Title is not
			complete
			AI - Authorized Representative Title is
69	Representative Title	is blank	missing
			DE - Section 2, Business Name
			Business Name is not complete
70	Business Name	is blank	AI - Business Name is missing
			DE - Section 2, Business Address
			Business Address is not complete
71	Business Address	is blank	AI - Business Address is missing
72	New Name	not verified	

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 3, Rehire Date Use this
			section if employee is being hired within
			3 years of the original date of hire. Use
			it to update or reverify employment
			eligibility. Do not use this date field for
	Rehire Date VS. Rehire	is not blank AND NOT	an update of continuing employment.
73	Confirmation Override	overridden	Please confi
			DE - Section 3, First Reverification
			Document Title First Reverification
	First Reverification		Document Title is MissingIf reverifying,
	Document Title VS.		only an employee eligibility document
	Number VS. First		from Section 2 List A or C is required
	Reverification Expiration	is blank AND (is supplied	AI - First Reverification Document Title
74	Date	OR is supplied)	is MissingIf rev
			DE - Section 3, First Reverification
	First Reverification		Document Number First
	Document Number VS.		Reverification Document Number needs
	Title VS. First		to be completed
	Reverification Expiration	is blank AND (is supplied	AI - First Reverification Document
75	Date	OR is supplied)	Number is missing
			DE - Section 3, First Reverification
			Document Number Alien Registration
		is choice 5 and length is	Number must be 8 or 9 digits and start
		10 or (starts with "A" and	with an 'A'
	First Reverification	length is 9) or (starts	AI - Reverification Document Number
	Document Title VS. First	without "A" and length is	must be 8 or 9 digits for an Alien
76	Reverification Number	8)	Registration Card

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 3, First Reverification
			Document Expiration Date First
			Reverification Document Expiration
	First Reverification		Date needs to be completed Al - First
	Expiration Date VS. First	is blank AND NOT	Reverification Document (title)
77	Reverification Title	choice 1,2, 3, or 5	Expiration Date is missing
			DE - Section 3, First Reverification
			Document Expiration Date First
			Reverification Document Expiration
		is prior to current date	Date has expired AI - First
	First Reverification	AND NOT choice is 1, 2,	Reverification Document (title) has
78	Expiration Date	3, or 5	expired (date)
			DE - Section 3, First Reverification
			Document Expiration Date First
	First Reverification		Reverification Document Expiration
	Expiration Date VS. First		Date needs to be completed
	Reverification Title VS.	is blank AND is choice 5	AI - First Reverification Document
79	Override Alien	AND NOT overridden	Expiration Date needs to be completed
			Trackingwill show up on Expiring
	First Reverification	is not blank AND NOT	Employment Documents Report 120
80	Expiration Date	choice 1,2,3, or 5	days prior to expiration
			DE - Section 3, First Reverification
			Document Expiration Date First
			Reverification document expired before
			reverification date AI - First
	First Reverification		Reverification Document (title)
	Expiration Date VS.		expired (date) before Reverification
81	Rehire Date	is prior to Rehire Date	Date (date)

5

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 3, Second Reverification
	Second Reverification		Document Title Second Reverification
	Document Title VS.		Document Title is MissingIf reverifying
	Second Reverification		only an employee eligibility document
	Number VS. Second		from Section 2 List A or C is required
	Reverification Expiration	is blank AND (is supplied	Al - Second Reverification Document
82	Date	OR is supplied)	Title is MissingIf
			DE - Section 3, Second Reverification
	Second Reverification		Document Number, Second
	Document Number VS.		Reverification Document Number needs
	Title VS. Second		to be completed
	Reverification Expiration	is blank AND (is supplied	Al - Second Reverification Document
83	Date	OR is supplied)	Number is missing
			DE - Section 3, Second Reverification
			Document Expiration Date, Second
	Second Reverification		Reverification Document Expiration
	Expiration Date VS.		Date needs to be completed AI -
	Second Reverification		Second Reverification Document
84	Title	is blank AND is choice 7	(title) Expiration Date is missing
			DE - Section 3, Second Reverification
			Document Expiration Date, Second
			Reverification Document Expiration
			Date has expired AI - Second
	Second Reverification	is prior to current date	Reverification Document (title) has
85	Expiration Date	AND is choice 7	expired (date)
			Trackingwill show up on Expiring
	Second Reverification	is not blank AND is	Employment Documents Report 120
86	Expiration Date	choice 7	days prior to expiration

5

Atty. Dkt. No.: MORL-25,783

# TABLE III: RULES FOR COMPLIANCE ANALYSIS

			Message (DE = Data Entry, Al =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 3, Second Reverification
			Document Expiration Date Second
			Reverification document expired before
			reverification date AI - Second
	Second Reverification		Reverification Document (title)
	Expiration Date VS.		expired (date) before Reverification
87	Rehire Date	is prior to Rehire Date	Date (date)
			DE - Section 3, Authorized
			Representative Signature Authorized
			Representative signature is missing
			AI - Authorized Representative
88	Representative Signature	is not present	signature is missing
	Section 3 Completion		DE - Section 3, Authorized
	Date VS. First Updated		Representative Signature Completion
	Document Fields VS.		Date is not completed
	Second Updated	is blank AND (is NOT	Al - Section 3 Completion Date is
89	Document Fields	blank OR is NOT blank)	missing
			DE - Section 3, Authorized
			Representative Signature The Section
			3 Completion Date is not the same as
			the reverification date. Verify dates on
	Section 3 Completion		form. Section 3 must be completed on
	Date VS. Reverification	is greater than the Rehire	the day of rehire by the employer.
90	Date	Date	Failure to do so is a violation. D
			DE - Section 3, Reverification
			Document Title Reverification
			Document type no longer acceptable
			after a Section 3 Completion date of
			09/30/97 AI - Reverification Document
	Section 3 Completion		(title) no longer acceptable after a
	Date VS. Reverification	is prior to 9/30/97 and is	Section 3 Completion Date of 09/30/97.
91	Document Title	choice 2,3,8, or 9	Ei

			Message (DE = Data Entry, AI =
			Additional Information, SC =
	Field	Condition	Statement of Completion)
			DE - Section 3, Authorized
			Representative Signature Date The
		is blank AND is NOT	Section 2 List A First Document Number
	Rehire Date VS. Section	blank AND NOT choice	has expired prior to Section 3
	3 Completion Date VS.	1,2, or 3 AND first	Completion DateVerify dates on form.
	Section 2 List A first	section 2 expiration date	SC - This I-9 Section 3 was not
	Expiration Date VS.	expired before section 3	completed prior to expiration of the
92	Section 2 List A Title	completion date	original Sect
			DE - Section 3, Authorized
			Representative Signature Date The
		is blank AND is NOT	Section 2 List C Document Number has
	Rehire Date VS. Section	blank AND is choice 7	expired prior to Section 3 Completion
	3 Completion Date VS.	AND section 2 expiration	DateVerify dates on form.
	Section 2 List C	date expired before	SC - This I-9 Section 3 was not
	Expiration Date VS.	section 3 completion	completed prior to expiration of the
93	Section 2 List C Title	date	original Section 2
			DE - Section 3, Rehire Date Need a
			Reverification Document from either
	Rehire Date VS. Section		listReverification document type
	3 Completion Date VS.		should be a List A or C document only
	first Reverification	(is not blank OR is not	because identity is established in
	Document List VS.	blank) AND first list is	Section 2
	second Reverification	blank AND second list is	Al - Need a Reverification Document
94	Document List	blank	from either listReverific
			DE - Employee terminated. Employer
			must retain I-9 for 3 years from date of
			hire or one year from date of
			termination, whichever is greater.
			Al - will no longer report on additional
			information requests.
			SC - Employee terminated. Employer
95	Employee Terminated	is checked	must retain I-

Lists of		
Acceptable		
Documents		
List A		
(Documents that		
Establish Both Identity	List B	List C
and Employment	(Documents that	(Documents that Establish
Eligibility)	Establish Identity)	Employment Eligibility)
	1. Driver's license or ID	
	card issued by a state or	
	outlying possession of	-
	the United States	
	provided it contains a	
	photograph or	
	information such as	1. U.S. social security card issued by
	name, date of birth, sex,	the Social Security Administration (other
1. U.S. Passport	height, eye color, and	than a card stating it is not valid for
(unexpired or expired)	address	employment)
	2. ID card issued by	
	federal, state, or local	
	government agencies or	
	entities provided it	
	contains a photograph or	
	information such as	
2. Certificate of U.S.	name, date of birth, sex,	2. Certification of Birth Abroad issued by
Citizenship (INS Form	height, eye color, and	the Department of State (Form FS-545
N-560 or N-561)	address	or Form DS-1350)
		3. Original or certified copy of a birth
		certificate issued by a state, county,
3. Certificate of		municipal authority or outlying
Naturalization (INS Form	3. School ID card with a	possession of the United States bearing
N-550 or N-570)	photograph	an official seal

	4. Unexpired foreign		
	passport, with I-551		
	stamp or attached INS		
	Form I-94 indicating		
	unexpired employment	4. Voter's registration	
	authorization	card	4. Native American tribal document
	5. Alien Registration		
	Receipt Card with		
	photograph (INS Form	5. U.S. Military card or	5. U.S. Citizen ID Card (INS Form
	I-151 or I-551)	draft record	I-197)
	6. Unexpired Temporary		
	Resident Card (INS Form	6. Military dependent's ID	6. ID Card for use of Resident Citizen in
	I-688)	card	the United States (INS Form I-179)
	7. Unexpired		
	Employment		7. Unexpired employment authorization
	Authorization Card (INS	7. U.S. Coast Guard	document issued by the INS (other than
	Form I-688A)	Merchant Mariner Card	those listed under List A)
	8. Unexpired Reentry	8. Native American tribal	
	Permit (INS Form I-327)	document	
	9. Unexpired Refugee	9. Driver's license issued	
	Travel Document (INS	by a Canadian	
	Form I-571)	government authority	
	10. Unexpired		
	Employment		
	Authorization Document	For persons under age	
	issued by the INS which	18 who are unable to	
	contains a photograph	present a document	
	(INS Form I-688B)	listed above:	
		10. School record or	
<u></u>		report card	
		11. Clinic, doctor, or	
		hospital record	
		12. Day-care or nursery	
1		school record	

35

#### TABLE IV: ALERTS

I-9 Alerts		
		Message (DE = Data Entry, AI =
		Additional Information, SC = Statement
Field	Condition	of Completion)
		Please call the office to clarify how to
1 Section 2, List B Title	is "Other"	handle this situation.
		Please be aware that this is to be a certified
		copy of a birth certificate, not a hospital
2 Section 2, List C Title	is "US Birth Certificate"	receipt.
		Please call the office to clarify how to
3 Section 2, List C Title	is "Other"	handle this situation.
		Not all alien registration cards have
		expiration dates. Confirm if card was
		unexpired when presented and that the
		photo on the card relates to the individual
	is "Alien Registration	presenting the card. Additionally, INS
	Card" and expiration date is	Form I-151 is no longer acceptable after
4 Section 2, List A Title	blank	March 30th, 1996.
		Not all alien registration cards have
		expiration dates. Confirm if card was
		unexpired when presented and that the
		photo on the card relates to the individual
		presenting the card. Additionally, INS
Section 2, List A First	is blank and List A Title is	Form I-151 is no longer acceptable after
5 Document Expiration Date	"Alien Registration Card"	March 30th, 1996.
		Not all alien registration cards have
		expiration dates. Confirm if card was
		unexpired when presented and that the
		photo on the card relates to the individual
	is "Alien Registration	presenting the card. Additionally, INS
	Card" and expiration date is	Form I-151 is no longer acceptable after
6 Section 3, List A Title	blank	March 30th, 1996.

36

#### TABLE IV: ALERTS

			Not all alien registration cards have
			expiration dates. Confirm if card was
			unexpired when presented and that the
			photo on the card relates to the individual
			presenting the card. Additionally, INS
	Section 3, List A Document	is blank and List A Title is	Form I-151 is no longer acceptable after
7	Expiration Date	"Alien Registration Card"	March 30th, 1996.
			The employer must look at the actual
			documents presented to verify that they
			appear to be genuine and to relate to the
8	Section 2, Completion Date	is not blank	employee.
	Section 1, Social Security		Any Social Security Number that starts with
9	Number	starts with a "9"	a '9' is not a valid number.
			Please refer to the associated Tip in regards
10	Section 1, Preparer Name	is blank	to filling out this section.
			Please refer to the associated Tip in regards
11	Section 1, Preparer Address	is blank	to filling out this section.
			Please refer to the associated Tip in regards
12	Section 1, Preparer Date	is blank	to filling out this section.
			Use of the name change field is typically
			used for a name change only. No other
			portion of Section 3 needs to be completed
			unless the employees identity must be
13	Section 3, New Name	is not blank	reestablished or in the case of rehire.
			For Foreign Passport verification, please list
			the Foreign Passport details first.
			Additionally, the I-94 Card may not be
		is a "Foreign Passport with	valid for employment. If valid for
		I-94 Card" choice and List	employment, employee status may be
}		A Issuing Authority is not	extended 240 days with a timely filed
14	Section 2, List A Title	"Foreign Passport"	application for extension.

TABLE IV: ALERTS

rification, please lis
ails first.
ard may not be
If valid for
status may be
a timely filed
a.
I-94 Card may not
t. If valid for
status may be
a timely filed
n.
rification, please lis
n C. Additionally,
e valid for
or employment,
extended 240 days
cation for extension
rification, please lis
ails first. J
dents should presen
<del>-</del>
_
ion of an unexpired expired I-94 card
ion of an unexpired expired I-94 card on and an unexpired
ion of an unexpired expired I-94 card on and an unexpired 66 and the I-94 may
ion of an unexpired expired I-94 card on and an unexpired 66 and the I-94 may
ion of an unexpired expired I-94 card on and an unexpired 66 and the I-94 may es (D/S refers to the
on and an unexpired 66 and the I-94 may es (D/S refers to the ary to complete the
ion of an unexpired expired I-94 card on and an unexpired 66 and the I-94 may es (D/S refers to the ary to complete the gram). Record here
expired I-94 card on and an unexpired 66 and the I-94 may es (D/S refers to the ary to complete the gram). Record here e field the IAP-66
ion of an unexpired expired I-94 card on and an unexpired 66 and the I-94 mayes (D/S refers to the ary to complete the gram). Record here e field the IAP-66 ate will be tracked).
expired I-94 card on and an unexpired 66 and the I-94 may es (D/S refers to the ary to complete the gram). Record here e field the IAP-66 ate will be tracked). d the I-94 admission
expired I-94 card on and an unexpired 66 and the I-94 may es (D/S refers to the ary to complete the gram). Record here e field the IAP-66 ate will be tracked). It will be tracked the I-94 admission if any, in writing or

#### TABLE IV: ALERTS

			(Exchange Visitors) students should present
			in a combination of an unexpired Foreign
			passport, an unexpired I-94 card reflecting
			J-1 classification and an unexpired Form
			IAP-66. The IAP-66 and the I-94 may both
			bear expiration dates (D/S refers to the
	i		duration of time necessary to complete the
			approved exchange program). Record here
			in expiration date field the IAP-66
			expiration date. (This date will be tracked).
			Employers should record the I-94 admission
			number and expiration, if any, in writing on
			the I-9 form in section C.
20	Section 2, List A Title	is a "Foreign Passport with	For Foreign Passport verification, please list
		I-20a/b Card" choice	the Foreign Passport details first. F
			(University or college) students should
			present a combination of an unexpired
			foreign passport, an unexpired I-94 card
			reflecting F-1or M-1 classification and an
			unexpired I-20ab document (D/S refers to
			period of time necessary to complete
			approved academic or training program).
			The I-20ab should be endorsed for the
			employment by the designated school
			official and include a period of time during
			which the employment may take place bear
			a work authorization expiration date. The
			I-94 card is usually marked with D/S
			(Duration of status). Record here at second
			expiration date field the IAP-66
			endorsement expiration date (work
			authorization rarely corresponds with
			duration of I-20 except for on campus
			employment). This date will be tracked.

TABLE IV: ALERTS

			Employers should record the I-94 admission
			number in writing on the I-9 form in sect A.
			For Foreign Passport verification, please list
			the I-20a/b details in section C. F
			(University or college) students should
			present a combination of an unexpired
			foreign passport, an unexpired I-94 card
			reflecting F-1 or M-1 classification and an
			unexpired I-20ab document (D/S refers to
			period of time necessary to complete
			approved academic or training program).
			The I-20ab should be endorsed for the
			employment by the designated school
			official and include a period of time during
			which the employment may take place bear
			a work authorization expiration date. The
			I-94 card is usually marked with D/S
			(Duration of status). Record here in
			expiration date field the IAP-66
			endorsement expiration date (work
			authorization rarely corresponds with
			duration of I-20 except for on campus
			employment). This date will be tracked.
	Section 3, First Document	is a "Foreign Passport with	Employers should record the I-94 admission
21	Title	I-20a/b Card" choice	number in writing on the I-9 form in sect C.
		is a "Foreign Passport"	
		choice other than I-94 and	
		List A Issuing Authority is	For Foreign Passport verification, please list
22	Section 2, List A Title	not "Foreign Passport"	the Foreign Passport details first.
		is not "Foreign Passport"	
		and List A Title is a	
	Section 2, List A Issuing	"Foreign Passport" other	For Foreign Passport verification, please list
23	Authority	than I-94 choice	the Foreign Passport details first.
	Section 3, First Document	is a "Foreign Passport with	For Foreign Passport verification, please list
24	Title	I-551 Card" choice	the I-551 details in section C.

ID	Field	Message
	Section 1, Last Name value	In section 1, ensure that the individual hired or recruited or referred for a fee provides his or her printed name. Failure to do so is a substantive verification failure. (See Memorandum, March 6, 1997; Interim Guidelines: Section 274A(b)(6) of the Immigration and Nationality Act Added by Section 411 of the Illegal Immigration Reform & Immigrant Responsibility Act of 1996) Go to www.lookoutservices.net/legal memorandum and resources.
2	Section 1. First name	In section 1, ensure that the individual hired or recruited or referred for a fee provides his or her printed name. Failure to do so is a substantive verification failure. (See Memorandum, March 6, 1997; Interim Guidelines: Section 274A(b)(6) of the Immigration and Nationality Act Added by Section 411 of the Illegal Immigration Reform & Immigrant Responsibility Act of 1996) Go to www.lookoutservices.net/legal memorandum and resources.
3	Section 1, Middle Initial	In section 1, ensure that the individual hired or recruited or referred for a fee provides his or her printed name. Failure to do so is a substantive verification failure. (See Memorandum, March 6, 1997; Interim Guidelines: Section 274A(b)(6) of the Immigration and Nationality Act Added by Section 411 of the Illegal Immigration Reform & Immigrant Responsibility Act of 1996) Go to www.lookoutservices.net/legal memorandum and resources.
4	Section 1, Maiden Name	In section 1, ensure that the individual hired or recruited or referred for a fee provides his or her printed name. Failure to do so is a substantive verification failure. (See Memorandum, March 6, 1997; Interim Guidelines: Section 274A(b)(6) of the Immigration and Nationality Act Added by Section 411 of the Illegal Immigration Reform & Immigrant Responsibility Act of 1996) Go to www.lookoutservices.net/legal memorandum and resources.